

## **REMARKS/ARGUMENTS**

Reconsideration and withdrawal of the rejection of the application are respectfully requested in view of the amendments and remarks herewith, which place the application into condition for allowance. The present amendment is being made to facilitate prosecution of the application.

### **I. STATUS OF THE CLAIMS AND FORMAL MATTERS**

Claims 1-14, 16-27, 29-37, 39-43, and 46 are currently pending in this application. Independent claims 27, 37, and 43 are hereby amended. Changes to claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicants are entitled.

### **II. REJECTIONS UNDER 35 U.S.C. §101**

Claims 27, 37, and 43 were rejected under 35 U.S.C. §101 as allegedly being directed to non-statutory subject matter. The Examiner has, however, indicated that this rejection may be overcome by changing the phrase “computer-readable medium” to “non-transitory computer-readable medium.” Applicants have accordingly amended claims 27, 37, and 43. Reconsideration and withdrawal of this rejection is therefore respectfully requested.

### **III. REJECTIONS UNDER 35 U.S.C. §103(a)**

Claims 1-8, and 46 were rejected under 35 U.S.C. §103(e) over U.S. Patent No.

6,898,762 to Ellis et al. (hereinafter, merely “*Ellis*”) in view of UK Patent Application No. 2343074 to Miller et al. (hereinafter, merely “*Miller*”), U.S. Patent No. 7,469,413 to Mizutome et al. (hereinafter, merely “*Mizutome*”), and further in view of U.S. Patent No. 6,437,836 to Huang et al. (hereinafter, merely “*Huang*”) and U.S. Patent No. 7,210,100 to Berger et al. (hereinafter, merely “*Berger*”). Claims 9, 14, 16-20, and 22-27 were rejected under 35 U.S.C. §103(a) over *Huang* in view of *Miller*, *Mizutome*, and *Berger*. Claims 10-13 and 21 were rejected under 35 U.S.C. §103(a) over *Huang* in view of *Miller*, *Mizutome*, and further in view of *Berger* and *Ellis*. Also, claims 29, 31-37, 39-40, and 42-43 were rejected under 35 U.S.C. §103(a) over *Ellis* in view of *Miller*, *Mizutome*, and further in view of *Huang* and *Berger*.

#### IV. RESPONSE TO REJECTIONS

Independent claim 1 recites, *inter alia*:

An information processing system comprising:

...

**converter means coupled to said storing means and providing means, said converter means converting, under control of said providing means, said program information retrieved from said storing means from a page description language format structured hierarchically using tags to another database format that excludes said tags, wherein said another database format comprises a less amount of data than said page description language and requires no data analysis following retrieval, ... (Emphasis added)**

Neither *Ellis*, *Miller*, *Mizutome*, *Huang*, nor *Berger*, taken either alone or in combination, disclose or render predictable:

- a “converter means coupled to [both] said storing means and providing means” [whereby];

- the “convertor means convert[s], under control of said providing means, said program information retrieved from said storing means”
  - “from a page description language format structured hierarchically using tags **to another database format that excludes said tags,**”
  - “wherein said another database format comprises a less amount of data than said page description language **and** requires **no data analysis following retrieval** [.] as recited in claim 1.

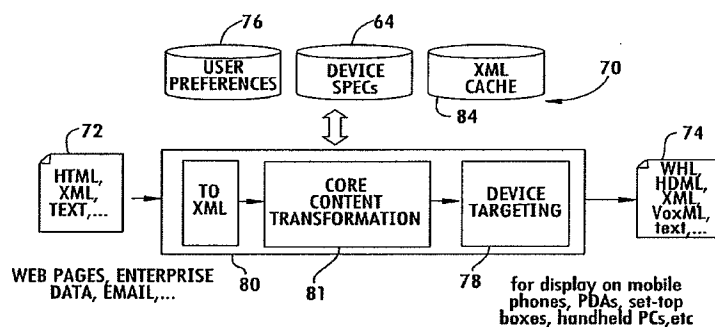
On pages 9 and 10 of the Office Action, the Examiner contends that the above recited features of Applicants’ claim is taught by *FIGS. 1 and 13*, and *column 10, line 43* through *column 11, line 54* of *Berger*. Applicants respectfully disagree based on at least the following:

According to *column 10, line 43* through *column 11, line 54* of *Berger*, as shown in FIG. 13 (illustrated below), an automatic content transformation system (70) can automatically compress and reformat documents (72) into formats that are optimal for display on specific target devices. This leaves content creators free to concentrate on writing content rather than on retargeting content for a variety of target devices. The content transformation system intercepts requests from non-traditional client devices, customizes the requested documents for display on the target device (78), and transmits the transformed documents (74) to the client.

The content transformation system employs user preferences (76) and device specifications (64) to guide the document transformation process. If the requested page (72) has been designed specifically for the client device making the request, content transformation isn't necessary. But designing documents for wireless devices is no simple matter. The document must be written in the markup language accepted by the device-sometimes HTML, but more

often another markup language such as WML, HDML, or a proprietary language. Because the hundreds of different wireless data devices each have different capabilities (64), a content creator faces the prospect of creating a separate version not only for each target markup language, but for every possible target device. The content provider also needs to understand how to detect the type of client device and create a document optimally formatted for that client. By using system (70), which automatically compresses and reformats a document (72) for optimal display on a specific target device, content creators are free to concentrate on their core competency--writing content--and not on retargeting content for a variety of target devices.

Once installed, a content transformation system intercepts requests from non-traditional client devices, customizes the requested document for display on the target device, and transmits the transformed document to the client. Content transformation systems can use automatic document segmentation to stage the delivery of large documents to devices incapable of processing large documents in their entirety. The core content transformation component (81) can include the segmentation process described earlier. The XML cache object (84) is where the per-user subdocuments are stored for the segmentation process.



**FIG. 13**

Content transformation is a server-side technology and can naturally be deployed at various locations in the client-origin server channel, anywhere from the wireless gateway to the origin server that holds the original content. The following table lists a few of the places content transformation is applicable.

Setting	Explanation	Benefits
Within a web server	As a plug-in module to Apache and competing web server software, allowing on-the-fly customized transformations to handheld devices.	After installation, the web server can automatically detect requests from wireless clients and generate content optimized for the requesting device.
Within a reverse proxy server	Transform all content from a single site or group of sites at a centralized location.	Same as above, but also exploits the proxy cache to centralize the transformation process and reduce server load.
Within a proxy server	A resource shared by a community (a company, for instance)	Enables users of the proxy to access the entire Internet with their wireless device.
At the wireless gateway	The gateway processes HTTP requests from wireless clients by fetching the requested URL and passing the document through the transformation process before delivering the document to the client device.	Allows all subscribers to that wireless service to access the entire Internet, customized to their device.
As stand-alone software	Integrated as part of the web-development process. Web developers can use the software as a rapid prototyping tool, refining the output by hand if desired.	Allows companies to create custom wireless content at a fraction of the cost associated with creating the content entirely by hand.

While *Berger* does merely provide an automatic compression and reformatting of documents for optimal display on specific target devices, there is no disclosure or inherent prediction by *Berger* as to:

- (1) A “convertor means” that “convert[s] ... program information ... from a page description language format structured hierarchically using tags to another database format that excludes said tags [;]”

(2) An “another database format” that “requires no data analysis following retrieval [;] AND

(3) A “convertor means” that is coupled to [both] a “storing means” and a “providing means [;]” such that the “providing means” controls the converting of the “conversion means [.]”

Therefore, for at least the foregoing reason, Applicants respectfully submit that claim 1 is patentable. Independent claims 5, 7, 9, 26-27, 29, 36-37, 39, and 42-43, which are similar in scope to claim 1, are also patentable for similar reasons.

Reconsideration and withdrawal of these rejections is, therefore, respectfully requested.

## V. DEPENDENT CLAIMS

The other claims in this application are each dependent from one of the independent claims discussed above and are therefore believed patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

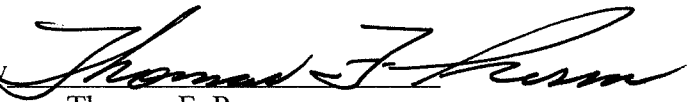
## CONCLUSION

In view of the foregoing amendments and remarks, it is believed that all of the claims in this application are patentable and Applicants respectfully request early passage to issue of the present application.

Please charge any additional fees that may be needed, and credit any  
overpayment, to our Deposit Account No. 50-0320.

Respectfully submitted,

FROMMER LAWRENCE & HAUG LLP  
Attorneys for Applicants

By   
Thomas F. Presson  
Reg. No. 41,442  
(212) 588-0800